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February 14, 2018

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Suite TW-A325  
Washington, DC 20554

Re: Annual CPNI Certification in EB Docket No. 06-36

Dear Ms. Dortch:

Please accept Tri County Telephone Association, Inc. and TCT WEST, INC's attached annual CPNI certification and accompanying statement of operating procedures ensuring CPNI compliance. If you have any questions, or should you need any additional information, please do not hesitate to contact the undersigned.

Sincerely,

Chris Davidson  
CEO

Enclosures

cc: Best Copy and Printing, Inc.

**Annual 47 CFR § 64.2009(e) CPNI Certification Template**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

1. Date filed: February 14, 2018
2. Name of company(s) covered by this certification: TCT West, Inc (808012) Tri County Telephone Association Inc. dba Tri County Telephone Association, Inc. (808011)
3. Form 499 Filer ID: 808011 808012
4. Name of signatory: Chris Davidson
5. Title of signatory: CEO
6. Certification:


I, Chris Davidson, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 CFR § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company {has not} taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. [NOTE: If you reply in the affirmative, provide an explanation of any actions taken against data brokers.]

The company {has not} received customer complaints in the past year concerning the unauthorized release of CPNI. [NOTE: If you reply in the affirmative, provide a summary of such complaints. This summary must include the number of complaints, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.]

The company represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed  [Signature of an officer, as agent of the carrier]

**Attachments:** Accompanying Statement explaining CPNI procedures  
Explanation of actions taken against data brokers (if applicable)  
Summary of customer complaints (if applicable)

## **STATEMENT EXPLAINING HOW TRI COUNTY'S PROCEDURES ENSURE COMPLIANCE WITH THE COMMISSION'S CPNI RULES**

*Tri County Telephone Association, Inc.* has established operating procedures to ensure compliance with the Federal Communications Commission's ("Commission") CPNI rules at 47 C.P.R. § 64.2001 et seq., as well as the requirements of 47 U.S.C. § 222 (c). These procedures apply equally to Tri County Telephone Association, Inc's subsidiary TCT WEST, INC. (together "Tri County"). Generally, these procedures are as follows:

- (1) Individual employees are required to adhere to Tri County's internal CPNI protection procedures, which have been established to comply with the Commission's CPNI rules as well as 47 U.S.C. § 222(c). This requirement is clearly established in Tri County's employee handbook, understanding of which all employees are required to acknowledge. Failure to adhere to these rules thus subjects employees to Tri County's disciplinary process, which can ultimately result in termination of employment.
- (2) Further, to make certain that all employees are fully capable of identifying CPNI as well as understanding this information's importance to its customers and the measures that Tri County takes to protect CPNI, all employees are required to attend training sessions (or independently view a recorded training session) conducted by Tri County's former Corporate Counsel that outlines these responsibilities. In addition, Tri County employees who hold positions for which use or disclosure of CPNI is required are specifically trained to comply with the nuances of rules that govern the use and disclosure of CPNI. Employees at all levels have also undertaken training conducted by various outside institutions, including trade organizations. Tri County also has an employee policy and procedures manual that explains CPNI and red flag rules.
- (3) All employees are trained to understand the practice of pretexting, how pretexting violates customer privacy and violates the Commission's rules, how to identify attempts at pretexting and other unauthorized breaches of CPNI security, and how to engage their supervisors to begin to report attempts at pretexting.
- (4) As part of their regular CPNI training, all employees are instructed and encouraged to direct any question concerning the proper treatment of CPNI to a supervisor, and all Tri County supervisors may direct questions concerning the proper treatment of CPNI to Tri County's Corporate Counsel. Tri County's senior management as well as its Corporate Counsel are all regularly engaged in compliance and are ultimately responsible for overseeing compliance with the Commission's rules.

Specifically, Tri County has enacted procedures to comply with the following Commission rules, compliance with which is ensured by the procedures outlined above.

- (1) Tri County provides wire line local and interexchange service. Tri County only uses CPNI without customer approval pursuant to 47 U.S.C. § 222(c)-(d), section 64.2005 of the Commission's rules, and where elsewhere specifically permitted by law. Where such use is prohibited without customer authorization, Tri County solicits opt-out approval and provides notices and solicits such approval from its customers consistent with notice and consent requirements of sections 64.2007-64.2008 of the Commission's rules. Tri County does not currently use, disclose or permit access to CPNI in a manner that requires obtaining opt-in consent from its customers.

- (2) All outbound marketing efforts are coordinated by Tri County's Area Managers, all of whom are trained in the proper use and disclosure of CPNI such that if any marketing effort uses CPNI, compliance with the Commission's CPNI rules can be ensured. Further, Tri County has in place a computer system by which a customer's CPNI approval can be clearly established, and records of the use of CPNI are kept pursuant to section 64.2009 of the Commission's rules. Tri County employees have received training to the effect that any failure to Tri County's opt-out mechanism requires notification to the Commission.
- (3) At this time, the company only engages independent contractors and third parties as necessary to render, bill, or collect for services. A "trusted third party" is employed to aid Tri County in fulfilling its responsibilities regarding lawful interception of communications and release of subscriber information, though such disclosure is only made "as required by law," 47 U.S.C. § 222(c)(1), and only for such purposes.
- (4) As of December 8, 2007, Tri County authenticates customers pursuant to section 64.2010 of the Commission's rules prior to disclosing CPNI based on customer-initiated contact via telephone or in person, regardless of whether the subject of such contact is call detail information or other CPNI. Unless otherwise allowed by, for example, section 64.2010(b) with respect to call detail information provided by the caller himself, Tri County only discloses such information during a telephone conversation or online after a customer has been authenticated by an established password (backup authentication has been established and operates without prompting and is not based on readily available biographical information). Where no password is provided, call detail information is disclosed only by calling the phone number of record or mailing the information to the address of record. Tri County requires a photo ID before such disclosure is made in person. Further, Tri County has procedures in place and has trained its employees to notify customers of account changes consistent with section 64.2010(f).
- (5) Tri County also has in place procedures, consistent with section 64.2011 of the Commission's rules, to notify law enforcement and affected customers of breaches of CPNI privacy. Further, Tri County has procedures to maintain records of such breaches for at least two years, consistent with section 64.2011(d).

These general procedures and specific rules and compliance procedures together ensure compliance with the Commission's rules, as well as the requirements of 47 U.S.C § 222(c).